

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

DUSTIN RALL (3)

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Case No. 3:18-cr-00623-S

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Defendant Dustin Rall files this Unopposed Motion to Continue the June 5, 2024 Sentencing Hearing, and all related deadlines, for three weeks, until the end of June or beginning of July. Mr. Rall pled guilty on July 7, 2023. ECF 850. He is scheduled to be sentenced on June 5, 2024 at 1:30 p.m. ECF 1083. Mr. Rall is intending to call Bill Seals as a witness during his sentencing hearing. Mr. Seals is unavailable on June 5, 2024, because he will be out of the country on business travel.

Mr. Seals' testimony will be helpful to the court in applying the 18 U.S.C. § 3553(a) sentencing factors. Mr. Seals is Mr. Rall's close friend and mentor. Specifically, Mr. Seals can speak to Mr. Rall's unique family situation, his likelihood of recidivism, and his educational and vocational activities.

Based on Mr. Seals' availability, Mr. Rall respectfully requests a continuance for approximately three weeks. Even with the continuance, Mr. Rall will be sentenced within the timeframe of the sentencings of Mr. Rall's co-defendants, which are currently scheduled throughout June. This continuance is not sought for delay, but to ensure that Mr. Rall is able to call an important witness and fully present his case at sentencing.

Defendant Dustin Rall therefore respectfully requests that the sentencing hearing and all related deadlines in this case be continued until the week of June 24. Specifically, the Defense and Mr. Seals are available on June 26, June 27, or June 28. The Defense and Mr. Seals could also be available July 3 or July 9 through July 12.

Dated: May 28, 2024

Respectfully submitted,

/s/ Peter Koski

Peter Koski (*pro hac vice*)

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Molly Brown

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ATTORNEYS FOR DUSTIN RALL

CERTIFICATE OF CONFERENCE

On May 28, 2024, the undersigned conferred with counsel for the government, Lee Hirsch, who indicated that the government does not oppose this motion.

/s/ Peter Koski
Peter Koski

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document was served upon counsel of record for all parties via the ECF system on May 28, 2024.

/s/ Molly Brown
Molly Brown